

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

<b>TAMARA WAREKA p/k/a/</b>	§	
<b>TAMARA WILLIAMS</b>	§	
<b>Plaintiff,</b>	§	
	§	
<b>V.</b>	§	<b>CASE NO. 1:21-cv-00382-LY-SH</b>
	§	
<b>ANA SQUARE d/b/a ANA</b>	§	
<b>SQUARE</b>	§	
<b>MICROBLADING; and</b>	§	
<b>DOES 1</b>	§	
<b>Though 10 inclusive,</b>		
<b>Defendants.</b>	§	

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**DEFENDANT' RESPONSES TO PLAINTIFF'S  
REQUEST FOR DISCLOSURE**

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To: Tamara Wareka p/k/a/ Tamara Williams, by and through her attorney of record, Mathew K. Higbee Higbee & Associates 1504 Brookhollow Dr. Ste 112 Santa Ana CA 92705

Defendant, Ana Square d/b/a Ana Square Microblading, serves these responses to Plaintiff's Request for Disclosures under the Federal Rules of Civil Procedure 26.

Respectfully submitted,

By: /s/ Carlos M. Quinonez  
Carlos M. Quinonez  
Texas Bar No. 24056172

Email: carlos@quinonezlawfirm.com  
11890 Vista Del Sol Dr., Suite A-115  
El Paso, Texas 79936  
Tel. (915) 533-0009  
Fax. (888) 301-1116  
Attorney for Plaintiff Defendant

**CERTIFICATE OF SERVICE**

By my signature below, I certify that a true and correct copy of the foregoing document was served on counsel for the Plaintiff in the manner indicated, on October 29, 2021, as follows:

VIA EMAIL: [mhigbee@higbeeassociates.com](mailto:mhigbee@higbeeassociates.com)

Mathew K. Higbee Higbee & Associates 1504 Brookhollow Dr. Ste 112 Santa Ana CA 92705

Attorney for Plaintiff

**RESPONSES TO REQUEST FOR DISCLOSURES**

Defendant, Ana Square provides her initial disclosures to Plaintiff. These disclosures are based on Defendant's preliminary understanding of the facts as set forth in the Petition and Answer. Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

**Response to request under Rule 26 1 (a) (i):**

Tamara Wareka p/k/a/ Tamara Williams, Plaintiff  
Mathew K. Higbee Higbee &  
Associates 1504 Brookhollow  
Dr. Ste 112 Santa Ana CA 92705  
Attorney for Plaintiff

Ana Square d/b/a Ana Square Microblading, Defendant  
c/o Carlos M. Quinonez  
Texas Bar No. 24056172  
Email: carlos@quinonezlawfirm.com  
11890 Vista Del Sol Dr., Suite A-115  
El Paso, Texas 79936  
Tel. (915) 533-0009  
Fax. (888) 301-1116

Jaime Square,  
11890 Vista Del Sol Dr.,  
El Paso, Texas 79936  
Tel. (915) 533-0009  
Fax. (888) 301-1116

Yaneli Campos Castillo  
Edmundo Martinez Street  
Col Primavera  
Tampico, Tampico Mexico

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

**Response to request under Rule 26 (1) (a) (ii):**

Documents provided in Response to Request for Production, and any documents produced by Plaintiff and Defendant.

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

**Response to request under Rule 26 (1)(a) (iii):**

No damages are sought at this time.

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.

**Response to request under Rule 26 (1) (a) (iv):**

There are no indemnity or insurance agreements.

Defendant, reserves the right to supplement or amend these disclosures, including pursuant to Fed. R. Civ. P. 26(e), after learning more about the nature and details of the facts.